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By Email

Yetta G. Kurland  
The Kurland Group  
86 Broad Street, 28<sup>th</sup> Floor  
New York, New York 10004

Re: *Local 2507 et al. v. City of New York*, 22-cv-10036 (AT) (GWG)

Dear Counsel:

We write to describe the City's search for documents responsive to Request for Production No. 22 in Plaintiffs' Fourth Combined Set of Interrogatories and Request for Production of Documents.

To locate documents responsive to Request for Production No. 22, Robert Alexander (Assistant Commissioner for Bureau of Examinations) searched his email box, local electronic files, and shared electronic files where Mr. Alexander reasonably believed responsive documents might be located. Mr. Alexander located the 1998 Notice of Examination produced by the City on February 20, 2025 at LOCAL 2507-DEF-0031508-31511. Phoebe Fong (Director of Exam Development Group), William Lotti (Deputy Director of Exam Development Group), and Rene Pryor (Deputy Director of Exam Development Group) also conducted searches of their email inboxes, local electronic files, and shared electronic files where they reasonably believed responsive documents might be located. Following the conclusion of their search, Mrs. Fong, Mr. Lotti, and Mrs. Pryor confirmed they could not locate documents responsive to this Request. Mr. Alexander, Mrs. Fong, Mr. Lotti, and Mrs. Pryor collectively spent approximately seven hours looking through these locations for responsive documents.

Sincerely,

/s/ *Lora Minicucci*

Lora Minicucci  
Assistant Corporation Counsel